



**Phone:** (718) 971-9474 | **Fax:** (718) 865-0943 | **Email:** Jonathan@Shalomlawny.com  
**Office:** 105-13 Metropolitan Avenue Forest Hills, New York 11375

**VIA ECF**

November 18, 2022

United States District Court  
Southern District of New York  
Attn: Ona T. Wang, U.S.M.J.  
500 Pearl Street, Courtroom 20D  
New York, NY 10007-1312

Re: Molina v. Hornblower Group, Inc., *et al.*  
Case No.: 1:20-cv-10821 (GHW) (OTW)  
Letter Motion Regarding Settlement Conference

Dear Judge Wang:

This office represents the Plaintiff in the above-referenced case. Plaintiff writes pursuant to this Court's October 19, 2022 Order (see ECF Docket Entry 57) concerning whether the parties believe a second pre-settlement call with the Court would be productive.

Because Defendants have not moved from their prior position, despite repeated requests and after multiple discussions with Defendants on October 26, 2022 and as recent as this morning, about Plaintiff's position regarding its current demand, Plaintiff respectfully submits that a second pre-settlement call would not be productive. This Court should also be aware that a CAMP conference is currently scheduled to take place on November 29, 2022 at 11:00 AM and the parties may either settle then, or – potentially- revisit the prospect of a second pre-settlement call with this Court after the CAMP conference.

Plaintiff thanks this honorable Court for its time and attention to this case.

Dated: Forest Hills, New York  
November 18, 2022

Respectfully submitted,

**SHALOM LAW, PLLC**

/s/ Jonathan Shalom  
Jonathan Shalom, Esq.  
10513 Metropolitan Avenue  
Forest Hills, NY 11375  
(718) 971-9474 (office)  
(718) 865-0943 (facsimile)  
jonathan@shalomlawny.com

*Attorneys for Plaintiff*